

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE TO
DAVID B. POPKIN INTERROGATORY
DBP/USPS-90
(January 7, 2002)

In accordance with Rules 25 and 26 of the Commission's Rules of Practice and Procedure, the Postal Service hereby objects to follow-up interrogatory DBP/USPS-90, filed by the David B. Popkin on December 17, 2001, on the grounds of that said interrogatories are procedurally improper.

Interrogatory 90 requests information that was initially propounded in DBP/USPS-84. The Postal Service properly objected to interrogatory 84 on the ground relevancy. Following Mr. Popkin's Motion to Compel, the Postal Service correctly filed an opposition to said Motion. Until the Commission has ruled on the outstanding motions, it would be improper for the Postal Service to respond to this request.

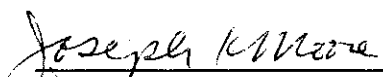
Consequently, the Postal Service requests that the Commission find this interrogatory objectionable and deny Mr. Popkin's discovery request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

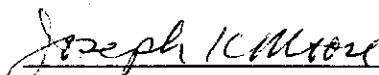
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Joseph K. Moore

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Joseph K. Moore

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January 7, 2002